**FILED** STEPHANIE M. HINDS (CABN 154284) 1 United States Attorney 2 Sep 27 2022 3 Mark B. Busby 4 CLERK, U.S. DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA 5 SAN FRANCISCO 6 7 8 UNITED STATES DISTRICT COURT 9 NORTHERN DISTRICT OF CALIFORNIA SAN FRANCISCO DIVISION 10 CASE NO. CR22-374 JSC UNITED STATES OF AMERICA, 11 12 Plaintiff. VIOLATIONS: 18 U.S.C. § 1343 – Wire Fraud; 18 13 v. U.S.C. § 981(a)(1)(C), 28 U.S.C. § 2461(c) – Criminal Forfeiture RYAN MARK GINSTER. 14 15 SAN FRANCISCO VENUE Defendant. 16 17 18 INFORMATION 19 The United States Attorney charges: 20 COUNT ONE: (18 U.S.C. § 1343 – Wire Fraud) 21 On the dates set forth below, in the Northern District of California and elsewhere, the defendant, 22 RYAN MARK GINSTER 23 Knowingly, and with the intent to defraud, participated in, devised, and intended to devise a scheme and 24 artifice to defraud as to a material matter, and to obtain money and property by means of materially false 25 and fraudulent pretenses, representations, and promises, and by means of omission and concealment of material facts. 26 27 28

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**INFORMATION** 

THE SCHEME AND ARTIFICE TO DEFRAUD

Beginning no later than February 2018, and continuing through no later than February 2021, GINSTER created and ran a fraudulent High-Yield Investment Plan (HYIP) website he created and maintained called Socialprofimatic.com. Using the Socialprofinatic.com website, GINSTER knowingly and intentionally communicated false statements and other material misrepresentations about investment opportunities, including that individuals who made cryptocurrency investments through the Socialprofimatic.com website would receive exorbitant rates of return, that the invested funds would be used to fund social media marketing campaigns, and that investors would be able to withdraw invested funds at any time. The false statements on the Socialprofimatic.com website were material to victim investors' decision to invest; that is, they had the natural tendency, or were capable, or influencing the investors to part with money or property. In total, the Socialprofimatic.com website collected cryptocurrency "investments" valued at the time at approximately \$844,667.93, which GINSTER never invested or used as he represented, instead keeping the funds and depositing them into cryptocurrency wallets and bank accounts under his control. On or around March 28, 2018, GINSTER intentionally stopped fulfilling investor orders or returning funds from individuals who had invested in Socialprofimatic.com.

#### THE USE OF INTERSTATE WIRES

On or about March 6, 2018, in the Northern District of California and elsewhere, for the purpose of executing the aforementioned scheme and artifice to defraud and attempting to do so, the defendant,

RYAN MARK GINSTER,

did knowingly transmit and cause to be transmitted in interstate and foreign commerce, by means of a wire communication, certain writings, signs, signals, pictures, and sounds, specifically, an interstate wire transfer of 0.0468793 Bitcoin from a Coinbase account controlled by an individual in the Northern District of California (Victim R.K.) into a bitcoin wallet GINSTER had established to receive investments in Socialprofimatic.com.

All in violation of Title 18, United States Code, Section 1343.

### <u>FORFEITURE ALLEGATIONS</u>: (18 U.S.C. § 981(a)(1)(C); 28 U.S.C. § 2461(c))

The allegations contained in the sole count of this Information are re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

Upon conviction of the offense set forth in this Information, the defendant,

#### RYAN MARK GINSTER,

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), a forfeiture Money Judgment in the amount of \$1,878,722.78 (the value of 98.12089739 bitcoins as of September 26, 2022), as well as the following property:

- **a.** Funds totaling \$130,225.69 seized from Carrollton Bank Account, account number ending in 0022;
- **b.** Funds totaling \$103,423.94 seized from an account at Coinbase, Inc., associated with an account number ending in 0090;
- c. Cryptocurrencies seized from an account at Coinbase, Inc., account number ending in 0090, including: .5 OMG; .7 KNC (Kyber Network Crystal); 2.05834621 BTC (Bitcoin); .006 DASH (Dash Coin); .25672100 XLM (Stellar Lumens); .070291 REP (Augers Reputation Tokens); .99 XTZ (Tez); .00884331 BSV (Bitcoin SV); .00160000 ZEC (ZCash); 1.58340000 ZRX (Ox); .03106781 ETC (Ethereum Classic).
- d. The cryptocurrency contained in an Electrum cryptocurrency wallet seized on February 23, 2021 from files on GINSTER's home computer, including 59.65924748 BTC (Bitcoin);
- e. The cryptocurrency contained in an Exodus cryptocurrency wallet containing DASH (Dash Coin), ETH (Ethereum), and LTC (Litecoin) cryptocurrencies, seized on February 23, 2021 from files on GINSTER's home computer; specifically 8.7461006 DASH; 49.798059 ETH; and 71.499593 LTC;
- f. The cryptocurrency contained on an Atomic Wallet, containing ETH (Ethereum),

1		BTC (Bitcoin), BCH (Bitcoin	n Cash), ALGO (Algorand), DASH (Dash Coin), and	
2		AWC (Atomic Wallet Coin);	cryptocurrencies, seized on February 23, 2021 from	
3		files on GINSTER's home co	omputer; specifically 279.656626718529 ETH;	
4		0.80018724 BTC; 3.4044528	88 BCH; 95,701.279423 ALGO; 13.31771828	
5		DASH; 28,434.57611336 AV	WC; 0.77268794 BTC (Bitcoin); and	
6	g.	The cryptocurrency containe	d on an Atomic Wallet seized on February 23, 2021	
7		from files on GINSTER's ho	me computer containing 6,008.255885 ATOM	
8		(Cosmos Cryptocurrency).		
9	If any of the property described above, as a result of any act or omission of the defendant:			
10	a.	cannot be located upon the exercise of due diligence;		
11	b.	has been transferred or sold to or deposited with, a third person;		
12	c.	has been placed beyond the jurisdiction of the Court;		
13	d.	has been substantially diminished in value; or		
14	e.	has been commingled with o	ther property which cannot be divided without	
15		difficulty;		
16	the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21,			
17	United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).			
18	All pursuant to Title 18, United States Code, Section 924(d), Title 28, United States Code,			
19	Section 2461(c), and Federal Rule of Criminal Procedure 32.2.			
20				
21				
22	DATED: September 26, 2022		STEPHANIE M. HINDS United States Attorney	
23			Office States Actionicy	
24			/s/ David Ward DAVID J. WARD	
25			Assistant United States Attorney	
26				
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28				



Sep 27 2022

Mark B. Busby
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO

# UNITED STATES DISTRICT COUP NORTHERN DISTRICT OF CALIFORN

## **CRIMINAL COVER SHEET**

<u>Instructions</u>: Effective November 1, 2016, this Criminal Cover Sheet must be completed and submitted, along with the Defendant Information Form, for each new criminal case.

CASE NAME:	CASE NUMBER:
USA v. RYAN MARK GINSTER	CR CR22-374 JSC
Is This Case Under Seal?	Yes No 🗸
<b>Total Number of Defendants:</b>	1 2-7 8 or more
Does this case involve ONLY charges under 8 U.S.C. § 1325 and/or 1326?	Yes No 🗸
Venue (Per Crim. L.R. 18-1):	SF 🗸 OAK SJ
Is this a potential high-cost case?	Yes No 🗸
Is any defendant charged with a death-penalty-eligible crime?	Yes No 🗸
Is this a RICO Act gang case?	Yes No 🗸
Assigned AUSA (Lead Attorney): David J. Ward	Date Submitted: September 26, 2022
Comments:	

**RESET FORM** 

SAVE PDF

DEFENDANT INFORMATION RELATIVE T	O A CRIMINAL ACTION - IN U.S. DISTRICT COURT
BY: ☐ COMPLAINT ☒ INFORMATION ☐ INDICTMENT	Name of District Court, and/or Judge/Magistrate Location
OFFENSE CHARGED SUPERSEDIN	NORTHERN DISTRICT OF CALIFORNIA
18 U.S.C. § 1343 – Wire Fraud Petty	SAN FRANCISCO DIVISION
Mino	
Misd	DEI ENDANT - 0.0
□ mean	nor RYAN MARK GINSTER
Felor	DISTRICT COURT NUMBER
PENALTY: 20 years imprisonment; \$250,000 fine; three years' supervised release: \$100 special assessment; restitution; forfeiture.	CR22-374 JSC
	DEFENDANT
PROCEEDING	IS NOT IN CUSTODY
Name of Complaintant Agency, or Person (& Title, if any)	Has not been arrested, pending outcome this proceeding.  1) If not detained give date any prior summons was served on above charges
person is awaiting trial in another Federal or State Court,	2) 🗌 Is a Fugitive <b>FILED</b>
	3) Sep 27 2022
this person/proceeding is transferred from another district	Mark B. Busby CLERK, U.S. DISTRICT COURT
per (circle one) FRCrp 20, 21, or 40. Show District	IS IN CUSTODY NORTHERN DISTRICT OF CALIFORNIA
	4) On this charge
this is a reprosecution of	5) 🗔 0
charges previously dismissed which were dismissed on motion of:  SHOW DOCKET NO	5) On another conviction Federal State
01.	6) Awaiting trial on other charges
U.S. ATTORNEY DEFENSE	If answer to (6) is "Yes", show name of institution
this prosecution relates to a	Has detainer Yes 1 If "Yes"
pending case involving this same defendant MAGISTRATI	give date
prior proceedings or appearance(s)	DATE OF Month/Day/Year
before U.S. Magistrate regarding this	ARREST
defendant were recorded under	Or if Arresting Agency & Warrant were not
Name and Office of Person Furnishing Information on this form STEPHANIE M. HINDS	DATE TRANSFERRED TO U.S. CUSTODY  Month/Day/Year
□ U.S. Attorney    □ Other U.S. Agency	
Name of Assistant U.S.	This report amends AO 257 previously submitted
Attorney (if assigned) AUSA David J. Ward	
PROCESS: ADDITIONAL INF	FORMATION OR COMMENTS ————————————————————————————————————
☐ SUMMONS 🔀 NO PROCESS* ☐ WARRANT	Bail Amount:
If Summons, complete following:	* Where defendant proviously approbanded an complete as new summers are
Arraignment Initial Appearance	* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment
Defendant Address:	Dete/Times
	Date/Time: Before Judge:
Comments:	